

# Exhibit 4

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NORTH CAROLINA  
SOUTHERN DIVISION  
Case No. 7:20-cv-248-FL**

MARY TOWANDA WEBSTER-REED,  
individually and as representative of the  
Estate of Brandon Lovell Webster, et al.

*Plaintiffs,*

v.

SCOTT ANTHONY COLLINS, *in his  
individual capacity,*

*Defendant.*

**DECLARATION OF BRADLEY J. BANNON**

Bradley J. Bannon, under penalty of perjury, declares:

1. I am an attorney practicing law in North Carolina.
2. I graduated from Campbell University Law School and was licensed to practice law in North Carolina in 1997.
3. I am also admitted to practice law in all three federal district courts in North Carolina and the Fourth Circuit Court of Appeals.
4. I joined the Raleigh law firm of Cheshire & Parker (now Cheshire Parker Schneider, or “Cheshire Parker”) in 1996 as a rising third-year law student and continued my practice there through the spring of 2016.
5. I joined the law firm of Patterson Harkavy LLP as a partner in June 2016.
6. At Cheshire Parker, I practiced at the trial court level in criminal defense in state and federal court and in professional licensing defense before the North Carolina State Bar Grievance Committee and Disciplinary Hearing Commission. I prepared and tried numerous

criminal cases, from misdemeanor bench trials to major felony jury trials, including first-degree capital murder. I also litigated and tried a civil case before the Disciplinary Hearing Commission.

7. At Patterson Harkavy, based on my 20 years of experience as a criminal defense trial lawyer, I expanded my practice to include the representation of plaintiffs in police misconduct civil rights cases, including cases involving traffic stops, police shootings, and other uses of excessive force. *See, e.g., Betton v. Knowles, et. al*, No. 4:15-cv-04638 (D.S.C.), and *Howard v. City of Durham et. al*, No. 1:17-cv-477-TDS (M.D.N.C.). In *Howard*, I was counsel of record for Plaintiff during a three-week jury trial in November 2021.

8. I have lectured at all of North Carolina's law schools on various aspects of criminal trial practice and legal ethics, and I have served as president of North Carolina's largest trial lawyer organization, the North Carolina Advocates for Justice.

9. I represent Plaintiffs in this case with my partners Narendra Ghosh and Paul Smith, and attorney Ira Braswell of the Braswell Law Firm. I began work on the case in March 2021. My partners and I agreed to represent the Plaintiffs in the present litigation in May 2021.

10. Our representation agreement with the Plaintiffs included a contingent attorney's fee of 40% of any recovery. I believe that a 40% contingency fee is reasonable in this case. Patterson Harkavy LLP typically charges a 40% contingency fee in civil rights cases settled after or near the close of discovery. A 40% contingent attorney's fee is customary in civil rights cases given their factual and legal complexity, and given the risks posed by the various immunities available to public officer defendants under state and federal law.

11. I contemporaneously kept track of my hours in order to ensure they were recoverable under 42 U.S.C. § 1988. A detailed accounting of my hours is attached as Exhibit A. I helped evaluate the merits of the case before accepting representation, had numerous meetings

and conferences with Plaintiffs and other witnesses over the course of the litigation, was involved in all aspects of the discovery process, conducted and was primarily responsible for preparing the half-dozen depositions in the case for Plaintiffs, participated in identifying and assisting multiple expert witnesses, and presented and was primarily responsible for preparing Plaintiff's mediation presentation.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

This the 26th day of September, 2022

  
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Bradley J. Bannon

# Exhibit A

| <b>Time for Bradley Bannon</b> |  |      |
|--------------------------------|--|------|
| Date                           | Description  | Time |
| 3/12/2021                      | Initial review of materials provided by IB, including partial SBI file materials; memo to PH team re same  | 3    |
| 3/29/2021                      | Additional comms & assessment re review of materials provided by IB  | 0.8  |
| 3/31/2021                      | Initial review of videos of SBI interviews of Scott Collins and WMcK   | 1    |
| 4/1/2021                       | Additional prep for and participation in team meeting re case; follow-up legal research  | 1.5  |
| 4/2/2021                       | Continued legal & factual research on issues related to stop; memo to team with updated analysis; follow-up comms among team re same   | 2.5  |
| 5/21/2021                      | Prep for, travel for, and participation in initial meeting with clients & co-counsel IB in Shallotte; visited scene of shooting & aftermath  | 7    |
| 5/24/2021                      | Drafted & filed notice of appearance   | 0.3  |
| 5/28/2021                      | Reviewed & suggested edits for ROGs; comms re subpoenas  | 0.8  |
| 6/1/2021                       | Reviewed & suggested edits for Rule 26 disclosures   | 0.3  |
| 6/10/2021                      | Team comms re experts  | 0.5  |
| 6/14/2021                      | Comms with KS re media search; comms with TWR about setting up meeting with WMcK and AmR, and updated team re same   | 0.8  |
| 6/17/2021                      | Comms with Ryan Smithwick re meeting & visit tomorrow  | 0.2  |
| 6/18/2021                      | Prep for, travel for, and conducted interviews of WMcK and AmR in Shalotte; updated NG re same   | 8.5  |
| 6/23/2021                      | Memo & analysis to team re recent interviews of WMcK and AmR, including review of & x-ref to file materials  | 3    |
| 7/19/2021                      | Comms re social media research   | 0.2  |
| 7/23/2021                      | Work on identifying reconstruction expert  | 0.5  |
| 8/18/2021                      | Team meeting re status of case and to do items   | 0.5  |
| 8/23/2021                      | Conference with PS re discovery to-date; comms with TWR re status of case & visit to scene   | 0.9  |
| 8/25/2021                      | Comms with TWR & AR about scene visit & other issues; work on subpoenas; comms & editing re extension motion; memo to team re recent comms with TWR & AR; comms with Ryan Smithwick re visiting scene; additional work re proprietors of Mini Mart | 2    |
| 9/1/2021                       | Begin review & organization of materials produced by LEAs (BCSO, CCSO, SBI, DPS-SHP) and Collins   | 3    |
| 9/3/2021                       | Work on subpoenas to DAOs and DOJ  | 1    |
| 9/7/2021                       | Review vidoes of IB interviews; conf. w/PS re: status of discovery & other to do items; reviewed reconstruction expert Bill Williams corr; comms with TWR & AR re: scene visit & Williams visit; attempted contacts with Mini Mart proprietors     | 4.5  |
| 9/8/2021                       | Comms with Bill Williams; team comms re: recent developments & to do items; continued organization of products for review & elimination of duplicates  | 4    |

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| 9/13/2021 | Additional work on DAOs & DOJ subpoenas; additional comms with Bill Williams  | 0.5 |
| 9/14/2021 | Comms with Bill Williams; comms with TWR about reconstruction issues & scheduling meeting; team comms re: same & amended complaint  | 1   |
| 9/15/2021 | Continued review of materials produced by LEAs & Collins; review of vidoes of witness interviews; worked on draft amended complaint, including legal research; team comms re: same  | 5   |
| 9/16/2021 | Continued work on draft amended complaint, including additional legal research; continued initial overview of productions from LEAs & Collins to identify deficiencies; scheduling comms with Ryan Smithwick re: draft amended complaint  | 4.5 |
| 9/17/2021 | Report from PS re: conference with Ryan Smithwick; additional work on draft amended complaint   | 0.5 |
| 9/20/2021 | Team comms re: motion to compel; additional work on draft amended complaint, including confs with NG & PS; team conference with TWR & AR re: same & general update; f/u comms with TWR; report from PS on conf. with OC re: supplemental discovery; f/u comms. re: same                                     | 3.5 |
| 9/21/2021 | Continued review of materials produced by LEAs & Collins; comms. with PS re: same and f/u with SHP counsel re: supplemental discovery; comms. re: motion to amend complaint   | 3.9 |
| 9/22/2021 | Comms re: subpoenas to DAOs & DOJ and scheduling Collins deposition; continued review of materials produced by LEAs & Collins; comms re: status of Bill Williams work and what materials to provide to him  | 2.5 |
| 9/23/2021 | Additional comms & work on subpoenas to DAOs & DOJ, incuding review of select file materials re: same; circulated drafts of subpoenas with cover explanation  | 2.9 |
| 9/24/2021 | Comms with Bill Williams; f/u comms. re: subpoenas; final drafting and issuance of subpoenas  | 2   |
| 9/28/2021 | Review of all BCSO body cam footage from night of shooting at all scenes; review of select docs in LEAs' production re same; memo to file & team re same; drafted f/u request for supplement production to BCSO; f/u comms. with team re same   | 6.5 |
| 9/29/2021 | Finalized & sent request for supplemental producion to BCSO; continued review of productions from LEAs & Collins  | 5.8 |
| 9/30/2021 | Comms re: Collins depo scheduling; continued review of productions from LEAs & Collins, with focus on request for supplemental production from DPS-SHP; team comms re same; conf. with PS re same   | 7.3 |
| 10/1/2021 | Team mtg re: Collins depodate & location; comms re: new subpoena to DPS-SHP; comms with OC about Collins deposition   | 1   |
| 10/4/2021 | Continued review of materials produced by LEAs & Collins; comms re: same and order of shooting; organization of materials in digital file; memo to KS and PS re: same; additional comms with KS about to do items for preparing materials to provide to Bill Williams; comms with OC re: Collins deposition | 5.3 |

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| 10/5/2021  | Continued review of materials produced by LEAs & Collins; continued organization of materials in digital file; additional comms with KS about to do items for preparing materials to provide to Bill; drafted initial index of productions from LEAs & Collins; began identifying additional deficiencies in productions; comms with team re: same; comms re: obtaining BW's hospital records  | 6.4 |
| 10/6/2021  | Continued review of LEAs' & Collins's productions and additional work on index; circulated index to team; drafted and sent initial memo to police practices expert Chuck Drago; memo to team re: status & issues related to experts' work; conf. with NG and f/u comms re: initial meetings with TWR, AR, and WMcK   | 5.5 |
| 10/7/2021  | Additional comms re: expert work; f/u comms with Drago re: scheduling confernece; worked on additional materials to provide to Williams and Drago; team comms re: forthcoming supplemental production from SBI in light of deficiencies in original production; received supplemental production from DPS-SHP  | 3.2 |
| 10/8/2021  | Continued review of initial & new supplemental productions from LEAs; comms re: review of new production of policies from SHP, added them to Dropbox folder for Drago; phone conference with Drago; f/u email to Drago with materials; comms with Bill Williams re: status of work & need for extension of expert report deadline; began preparing Dropbox folder for additional materials to Williams; comms with OC re: status of supplemental production from Collins in light of deficiencies in initial production; comms with SHP counsel re: continued deficiencies in subpoena production and request for additional documents | 4.6 |
| 10/10/2021 | Review to-date comms with Bill Williams about his work; f/u comms with PS re: same & need for conference with Williams   | 1   |
| 10/11/2021 | Prep for & participated in video conference with Bill Williams re: status of his work; f/u comms with NG & PS re: same; continued review of supplemental productions from LEAs; team comms re: next steps to compel production from Collins and SHP re: deficiencies in discovery productions & responses to informal inquiries; team comms re: inspection of Mini Mart for reconstruction   | 5.7 |
| 10/12/2021 | Comms among team and with OC re: obtaining extension for production of expert materials  | 0.4 |
| 10/13/2021 | Continued review of initial & supplemental productions from LEAs & Collins; continued identification of deficiencies, including Collins's post-shooting fitness review & entire medical file at DPS; drafted & circulated for team comment formal requests to OC (re: Collins deficiencies) and DPS counsel (re: SHP deficiencies) as prelude to motion to compel; phone conference with DPS counsel re: discovery deficiencies, and updated & circulated formal request with new information; worked on motion for discovery extension; team comms  | 9   |



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|            | and contacts with SBI counsel re: traffic stop data for Collins; finalized & sent formal request to OC re: discovery deficiencies  |     |
| 10/14/2021 | Additional work on formal request to DPS counsel re: SHP deficiencies, finalized, and sent with new subpoena; f/u comms with SBI counsel re: Collins's traffic stop data; notice to OC re: new subpoena to DPS; comms with Bill Williams about request for extension and need for video in light of Collins's upcoming deposition; received and reviewed supplemental production from BCSO and updated team re: same; began working on outline for Collins depo and assembling exhibits  | 5   |
| 10/15/2021 | Continued review of initial & supplemental productions from LEAs & Collins; continued work on outline & assembling exhibits for Collins's upcoming deposition; comms with team about next steps in light of lack of response from DPS to formal request for supplemental production  | 5.8 |
| 10/17/2021 | Continued review of initial & supplemental productions from LEAs & Collins; continued work on outline & assembling exhibits for Collins's upcoming deposition  | 7.5 |
| 10/18/2021 | Comms with Bill Williams re: status of video sync project; team comms re: status of Williams work & scope going forward; f/u comms with DPS counsel re: SHP deficiencies; received & reviewed supplemental production from SHP re: Collins's resignation; continued review of initial & supplemental productions from LEAs & Collins; continued work on outline & assembling exhibits for Collins's upcoming deposition; comms with KS re: Collins depo exhibits; team conference & f/u comms with OC about possible postponement of Collins's depo in light of continued material deficiencies in SHP productions | 8   |
| 10/19/2021 | Received & reviewed Collins's Answer to Amended Complaint; reviewed video of IB interview of eyewitness SZH; final team conf re whether to postpone Collins's upcoming deposition; conference with TWR & AR about status of case, deficiencies in discovery productions, need to postpone Collins's deposition, and other issues; memo to file & team re same; comms with Bill Williams; comms about failure of all three prosecutors' offices to respond to subpoenas in any way  | 4.5 |
| 10/20/2021 | Team comms about status of Bill Williams's work and scope going forward; various comms about setting a date/time for Mini Mart access & reconstruction and issuing subpoena for access   | 1.3 |
| 10/27/2021 | Follow-up communication with DPS counsel about SHP's continued failure to adequately respond to subpoenas; comms with DOJ Special Prosecutions about subpoena; email to team about digital file organization of recent productions   | 1   |

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| 10/28/2021 | Phone conference with DOJ Special Prosecutions Section Chief re subpoena for their investigative file; memo to team re same  | 0.8 |
| 11/1/2021  | Worked on subpoena and cover letter re access to Mini Mart for reconstruction; team comms re same;   | 1   |
| 11/2/2021  | Follow-up comms with Special Prosecutions Section Chief re subpoena for their investigative file; comms re locating & interviewing witness SZH; comms re identifying damages witnesses; team comms re ongoing work of Bill Williams  | 1.5 |
| 11/4/2021  | Comms with PS & NG re recent contacts with Bill Williams and questions & decisions re same; comms with Special Prosecutions Section Chief re subpoena; conference with Boo Moore re expert issues; f/u conference with NG & PS about what experts we need and next steps to get them; comms with MM about potential bullet trajectory expertise; reviewed file materials related to medical expert re pain & suffering and f/u email to team re same | 3   |
| 11/5/2021  | Additional comms re: need for bullet trajectory expert; initial phone conference with Dr. Arden re medical expert work; comms with PS to hand off various outstanding discovery issues while I'm in trial  | 2.5 |
| 11/8/2021  | Comms with MM about potential bullet trajectory analysis work  | 0.2 |
| 11/10/2021 | Reviewed recent emails re expert work; replied re bullet trajectory expert work  | 0.2 |
| 12/1/2021  | Worked on draft supplemental Rule 26 disclosures, including select file review, and f/u comms with PS re same  | 2   |
| 12/2/2021  | Team conference re potential additional claims for TWR & AR; f/u with BCSO re deficiencies in supplemental production; f/u comms among team re same  | 1.5 |
| 12/6/2021  | Work on bullet trajectory expert issues and team comms re same   | 0.3 |
| 12/7/2021  | Work on bullet trajectory, pathology, and police practices expert issues, reports, and select file review of LEA materials and policies re same; multiple conferences with PS & team comms re same   | 6.5 |
| 12/8/2021  | Work on reconstruction expert issues and report, and select file review of LEA materials re same   | 2   |
| 12/9/2021  | Continued f/u with BCSO re deficiencies in supplemental production; continued work on potential additional claims for TWR & AR, including legal research and select file review (including video & audio productions); memo to file & team re same; conference with PS re status of all expert work & multiple team comms re same  | 5.5 |
| 12/10/2021 | Continued work on police practices expert issues and team comms re same; f/u comms & conference with Chuck Drago re same; review of updated draft report; additional comms re potential claims for TWR & AR  | 4.3 |
| 12/13/2021 | Additional comms with Special Prosecutions Section Chief re subpoena for their file; issued corrected subpoena; f/u team comms re same; initial review of initial draft Williams report re reconstruction; multiple conferences with PS & team comms re same   | 3.5 |

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| 12/14/2021 | Additional work on draft Williams report re reconstruction, including select review of file materials & underlying data; multiple comms with PS re same; comms with Bill Williams re same   | 5   |
| 12/15/2021 | Continued work on draft Williams report re reconstruction, including review of underlying data; multiple comms with PS and Bill Williams re same  | 3   |
| 12/16/2021 | Review of updated Williams expert report & addenda re reconstruction; team conference and multiple comms with PS re same; comms with Williams re same   | 3.6 |
| 12/17/2021 | Final work on production of police practices, reconstruction, and bullet trajectory expert materials, including additional work and finalizing of all reports to be filed; comms with Chuck Drago and Bill Williams re same; multiple team comms re same; comms with TWR and AR re status of all work on the case; prep for and led conference with TWR and AR re conclusions about potential additional claims | 4.5 |
| 12/22/2011 | Follow-up comms with Special Prosecutions Section Chief re subpoena for their file  | 0.3 |
| 1/3/2022   | Reviewed supplemental productions received from SHP while I was I trial; f/u comms with team re same and continued deficiencies re Collins's fitness evaluation; memo to file & team re same; f/u team comms re same and developing depoplan & schedule; email to OC re scheduling depofor Collins  | 4   |
| 1/5/2022   | Team conference re continued deficiencies in SHP subpoena productions and strategy for next steps; attempted contact with SHP counsel re same; comms re potential IC claims for WMcK; research re Robert Rella (re Collins fitness eval) & his current location; drafted subpoenas for Rella; drafted subpoena for SHP Medical Director and sent it with cover letter to SHP counsel; comms with OC re same     | 2.7 |
| 1/6/2022   | Follow up comms with OC re scheduling depofor Collins; f/u comms re potential IC claims for WMcK  | 1   |
| 1/10/2022  | Team conference re potential IC claims for WMcK and status of other to do items; work on Collins traffic stop data issues, including review of select LEA production materials and IAD file and previous correspondence   | 2.5 |
| 1/12/2022  | Consult with Matt Ballew on various issues; reviewed LEA production materials re: on-scene LEO witnesses and f/u IAD investigation of Collins for purposes of identifying deponents; memo to team re same, with proposal for deponents & deposcheduling   | 6.3 |
| 1/13/2022  | f/u team comms re proposed deponents and deposcheduling; f/u comms with OC re scheduling Collins's depoand court-ordered mediation; comms with DPS counsel re scheduling deposfor current & former SHP members; f/u comms with AG's Office re scheduling of SHP members' depositions; work on RFAs; additional team comms re deposcheduling in light of responses from AGO                                      | 2.2 |

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| 1/14/2022 | Review of Special Prosecutions Section subpoena production; f/u comms with Section chief re same; drafted and served subpoena for Collins deposition; f/u comms with OC re same & scheduling other depositions; comms with KS about scheduling depositions & mediation; received & initially reviewed supplemental subpoena production from SHP with Collins medical record; memo to team & file re same; conf with NG & f/u comms with team re same | 6.5 |
| 1/18/2022 | Multiple comms among team and with AGO re scheduling depositions for SHP member-deponents; drafted subpoenas for SHP member-deponents and sent them to AGO counsel with cover letter re scheduling; letter to OC with enclosures re same; worked on final supplemental disclosure production, including review of select file materials and multiple team comms; memo to team & file re same   | 6.3 |
| 1/19/2022 | f/u comms with AGO re scheduling of Capt. Whaley deposition & issued amended subpoena re same; final work on today's final supplemental disclosure deadline & production; team comms re scheduling vendors for depositions   | 2   |
| 1/21/2022 | Work on RFAs to Collins, including conf with PS, multiple team comms, and edits  | 1   |
| 1/24/2022 | Comms re obtaining declarations from witnesses LE and LW; comms with AGO re depositions of SHP members   | 0.5 |
| 1/25/2022 | Worked on draft declarations for witnesses LE & LW, including select review of relevant file materials, editing, and comms among team; reviewed final supplemental production from SBI, including new audio files; comms re mediation  | 3   |
| 1/26/2022 | Work on SZH declaration, including comms re communicating with him while he's incarcerated   | 1   |
| 1/27/2022 | Update from PS re comms with TWR & AR; comms with OC & mediator's office re mediation  | 0.3 |
| 1/30/2022 | Began prep for depositions of Collins and SHP members, including file review & exhibit prep  | 4.5 |
| 2/1/2022  | Continued prep for depositions of Collins & SHP members, including file review & exhibit prep & begin drafting outlines; conf with PS re same  | 5.5 |
| 2/2/2022  | Continued prep for depositions of Collins & SHP members, including review of videos of Collins interviews for purposes of preparing clips, comprehensive review of Collins medical records & fitness eval file; continued review of additional LEA materials & exhibit prep & drafting outlines; drafted chart of Collins's prior discipline; team comms re same & private investigator work   | 6.3 |
| 2/3/2022  | Continue prep for Collins deposition, including LEA production review, video review & editing for exhibits, work on outline; multiple conferences with PS and team re same; team comms re conducting depositions via video conferencing and how to provide exhibits  | 7.2 |

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| 2/4/2022  | Comms with OC re Collins depo start time & providing exhibits; continued work on Collins depo prep and exhibit prep; completed & circulated initial draft of Collins depo outline with link to referenced exhibits; f/u team comms & edits re same; f/u email to OC with link to potential exhibits for Collins depo; conf with NG re various issues related to depositions of SHP members; team comms re SHP reconstruction work & potential MIL | 8.5 |
| 2/5/2022  | Additional work on Collins depo and outline in light of feedback from team; f/u comms & edits re same; f/u comms with OC re email with depo exhibits; team comms re strategy for response to OC request; replied to OC request  | 6.7 |
| 2/6/2022  | Work with TP on test run for Collins video conference depo with A/V exhibits & documentary exhibits; comms with depo vendor re same;  | 1.0 |
| 2/7/2022  | Final prep for Collins depo; began Collins depo; comms with OC and among team about recessing Collins depo & resuming later in light of news of death in family; began work on outline for depo of SHP IAD Capt. Shannon Whaley; email to court reporter with link to exhibits from today's portion of Collins depo   | 6.3 |
| 2/8/2022  | Worked on edits to remainder of Collins depo outline in light of first part of depo testimony; comms among team re same; continued work on Whaley depo prep, including video clips from his IAD interviews; comms with SBI counsel re double-checking about additional video in SBI investigative file in light of Collins's initial depo testimony   | 5.9 |
| 2/9/2022  | Continued work on Whaley depo prep, completed & circulated initial draft outline; worked on additional exhibits for Whaley depo; email to AGO counsel for SHP deponents with link to possible exhibits for use in Whaley depo; comms with OC about Collins's availability to resume depo tomorrow   | 8   |
| 2/10/2022 | Final prep for resumption of Collins depo; resumed & concluded Collins depo; additional prep for Whaley depo in light of feedback from team; continued work on bookmarking excerpts of video interviews of Collins for use in depositions; sent amended notice of Scott Ransom depo to AGO with cover letter  | 7.5 |
| 2/11/2022 | Final prep for Whaley deposition; conducted Whaley deposition; sent email to court reporters with links to exhibits used in yesterday's second part of Collins depo and today's Whaley depo; team conference after Collins and Whaley depositions about how to approach remaining SHP member depositions  | 8   |
| 2/13/2022 | Prep for C.V. Ward depo; drafted & circulated outline based on team meeting on Friday; prep for Matt King depo, including work on outline   | 5.5 |

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| 2/14/2022 | Completed outline and prep for King depo, circulated outline; f/u team comms re same; conducted King depo; prep for Pat Sanders depo, including work on outline; additional work on Ward depo prep in light of feedback from team   | 6   |
| 2/15/2022 | Final prep for Sanders and Ward depositions; conducted Sanders and Ward depositions; email to court reporter with link to all exhibits introduced in depositions through today's; comms with mediator   | 5.8 |
| 2/17/2022 | Conf with TWR to update her on depositions and next steps re mediation; updated NG & PS re same; call with SBI counsel re traffic data stop information & SHP interplay   | 1   |
| 2/18/2022 | f/u comms with SBI counsel re traffic data stop information; comms with Ryan Smithwick re upcoming mediation  | 0.5 |
| 2/22/2022 | Team comms re attempts to get eyewitness declarations and other next steps, including interviewing TWR on video; conference with TWR re same; comms re obtaining transcripts & video of depositions   | 1.2 |
| 2/23/2022 | Team conference about presentation for mediation, including video interview of TWR; comms re scope of insurance coverage & confirming same with OC  | 0.8 |
| 2/25/2022 | Worked on draft letter to mediator, including multiple team comms and edits; prep for and conducted video interview of TWR for use at mediation; review & timestamp digest of all SHP radio traffic on the night of the shooting for tightening timeline and possible use of clips in Scott Ransom depo and mediation presentation; review & timestamp digest of videos of interviews of LW & LE for possible use of clips in mediation presentation  | 6.5 |
| 2/27/2022 | Prep for Scott Ransom depositions, including drafting & circulating outline to team   | 1.5 |
| 2/28/2022 | Final prep for Scott Ransom depo and conducted Ransom depo; worked on final edits to mediator letter; video conference with team about strategy for mediation, including presentation and demand; began work on mediation presentation PPT  | 6.5 |
| 3/1/2022  | Final work on letter to mediator; phone, email, and text comms with TWR re pictures & video of Brandon and availability for pre-mediation video conf; reviewed video & pics for use in mediation presentation PPT; continued additional work on PPT, including video excerpts & editing; phone conf with Ryan Smithwick re upcoming mediation & related issues; drafted demand letter to OC and circulated it to team; f/u team comms & edits to letter; finalized letter and sent it to OC | 8.2 |



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| 3/2/2022  | Phone conf with OC re upcoming mediation; research on comparable settlements & verdicts and f/u team comms re same; pre-mediation video conf with TWR, AR, and Ryan Smithwick; continued work on mediation presentation PPT, including timestamp digest of video interview of TWR and work on other video excerpts & editing, and work on portions of expert reports for excerpt & custom animation | 7.5          |
| 3/3/2022  | Phone conf & email comms with OC about tomorrow's mediation and potential rescheduling; f/u comms among team and with OC re same; continued work on mediation presentation PPT, including photo, video, and document excerpts & timeline & custom animation re prior discipline and post-shooting conduct & investigation; video conf with NG & PS re same  | 8            |
| 3/4/2022  | Final work on mediation presentation; team conference about how to handle mediation in light of recent contacts from OC about usefulness & rescheduling; initial mediation; f/u team conf re next steps   | 4            |
| 3/7/2022  | Team conf & f/u comms re communicating with OC about continued interest in another mediation when more decisionmakers are available; f/u comms with OC re same  | 1            |
| 3/9/2022  | f/u team comms and comms with OC about scheduling second mediation with Rene Trehy  | 1            |
| 3/15/2022 | Work on SZH declaration   | 0.4          |
| 3/17/2022 | Conf with OC about second mediation and updated team re same; f/u team comms re same; conf with PS about f/u response to OC; reviewed and commented on PS's proposed response   | 1.7          |
| 3/21/2022 | Comms re confirming second mediation via video conference; comms with OC re video files shared after previous conference  | 0.5          |
| 3/23/2022 | Comms with Ryan Smithwick re upcoming second mediation; updated & circulated draft letter to mediator   | 1            |
| 3/24/2022 | Finalized letter to mediator Rene Trehy and emailed it to her with link to exhibits; comms with TWR & AR re second mediation  | 1            |
| 3/29/2022 | Reviewed previous draft of mediation presentation PPT; began revision in light of intervening comments & input from OC  | 2.5          |
| 3/30/2022 | Contact from OC with additional comments & insight re: mediation, as well as list of attendees including DPS General Counsel, SHP Commander, and two insurance adjusters; continued revision of mediation presentation PPT re liability & damages in light of those comments & list of attendees; did a run-through with PS; comms with TWR re forecast for tomorrow & what to expect               | 5            |
| 3/31/2022 | Final work on revised mediation presentation PPT; mediation   | 13.5         |
|           | <b>Total:</b>   | <b>424.4</b> |